

I am opposed to RM-10352. RM-10352 if implemented would create a mandatory cw only sub-band in the 160 meter amateur allocation. This is unneeded regulation. I am unaware of ssb or other wideband operation that impedes cw operation in the 160 meter band. I have made a point of listening to the band with a good 160 meter dipole on winter nights, the height of 160 meter cw dx season. I typically hear only a handful of cw stations, usually less than five. I have not heard any ssb or other wideband transmissions below 1.843 MHz.

On the other hand, when there is a cw contest, there are stations all the way up the band past 1.900 MHz. Morse and wideband modes have coexisted peacefully on this band for many years.

Morse (c.w.) is a narrow band mode that by its nature does not require more than a few hundred Hz. The use of narrowband i.f. filters (essential for dx operation) also provide rejection of any potential sideband or other wideband interference.

CW on the other hand can easily interfere with wideband modes.

The proposed RM-10352 offers a solution for a non-existent problem. The petitioners have not demonstrated a need for this additional level of regulation.

The creation of sub-bands runs counter to the trend in the rest of the world which is to remove mode-specific sub-bands, not create new ones.

Thank you for your consideration of my comments.

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